As the FCC explores ways to promote 'localism' amid the mediaownership debate, I encourage policymakers not to forget the standard-bearers for free, locally controlled, community-supported over-the-air media: public television and radio stations.

Local public broadcasting organizations focused on providing educational services, such as commercial-free content to children and non-partisan news and information programming, are vulnerable as the digital transition moves forward. The FCC can support local, community-focused programming by prescribing the retransmission of public television and radio stations' analog and digital signals wherever possible.

For instance:

- Transitional cable carriage for digital television signals. Without required cable carriage of digital signals during the transition, public television stations face the operating costs of two stations at once funded with the exposure of one station.
- Full cable carriage for digital television signals. Even once the transition to digital is complete, under current FCC rules the 70 percent of the public that subscribes to cable will be able to view only a portion of the digital television broadcast signal. Without full and complete carriage on cable, public television stations will not be able to develop the locally tailored multicast channels the digital revolution promises.
- Satellite carriage, analog and digital television. Echostars attempt to segregate the analog signal of some educational broadcasters on wing satellites that require the installation of an additional dish is discriminatory and illegal. The FCC should stop this practice. Also, satellite television should not be exempt from the kinds of requirements that apply to cable when it comes to digital signals.
- Rules to allow development of digital translators. The current analog translator service delivers local noncommercial educational services to areas of the country that cannot receive over-the-air signals due to terrain or other factors. The FCC should swiftly enact rules to allow for the operation of digital translators or equivalent technology to ensure that rural Americans do not lose access to these local services.

Cordially,

Jeff Clarke
President and CEO
KQED, Inc.